

September 22, 2023

VIA ECF

Honorable J. Brendan Day
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

**Re: *MacLean, et al. v. Wipro Limited*, No. 3:20-3414-GC-JBD
Joint Request to Adjourn September 25, 2023 Telephonic Status Conference**

Dear Judge Day:

As Your Honor is aware, a telephonic status conference in the above-referenced matter is currently set for September 25, 2023. *See* Dkt. 41 at 2. The parties write jointly to request that the Court adjourn the telephonic status conference in light of the current stage of discovery and the fact that there are currently no issues ripe for discussion with the Court.

Since the June 29, 2023 status conference, the parties have issued their initial sets of discovery requests and have responded to those requests, with the exception of Wipro's First Set of Interrogatories, which were served this week. The parties have also each made an initial document production. Those documents production efforts are ongoing, and the parties will need to agree upon appropriate ESI custodians, search terms, and document repositories for much of Wipro's document production.

The parties are now in the process of meeting and conferring regarding each party's objections and responses. Specifically, the parties held an initial meet and confer on September 19, 2023 and plan to continue the meet and confer process in the coming days. The parties expect that there will be discovery disputes to raise with the Court, but are working to resolve and ripen the issues in dispute. At this juncture, the parties require additional time to confer regarding those disputes and to raise any disputes that the parties are unable to resolve with Your Honor in a Joint Letter. *See* Case Mgmt. Order § 5 (setting forth discovery dispute procedure). Because the parties are in the process of ripening their discovery disputes, they respectfully request that the Court adjourn the September 25 telephonic status conference until after the parties have had an opportunity to complete this meet and confer process and submit a Joint Letter detailing any unresolved discovery disputes. In the meantime, the parties will continue to confer in good faith and attempt to resolve discovery disputes without Court intervention.

Of course, if Your Honor would still like the parties to appear on Monday, we will be prepared to do so.

We thank Your Honor for his attention to this matter.

Joint Letter to Judge Day
September 22, 2023

Sincerely,

/s/ Jonathan Rudnick
Jonathan Rudnick
Daniel Kotchen (*pro hac vice*)

Attorneys for Plaintiffs and Putative Class

/s/ Stephanie Silvano
Stephanie Silvano
Greta Williams (*pro hac vice*)

Attorneys for Defendant Wipro Limited

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on all counsel of record by electronic service through the Court's CM/ECF system.

By: /s/ Jonathan Rudnick